



Days or months between submission of application (annual update) and date of inspection? If length of time is unreasonable, why?	Less than one month.
International Agreements	
Does the operation participate in any international agreements, such as: <ul style="list-style-type: none"> • EU equivalency • Canada equivalency • Japan or Taiwan export arrangement 	None yet, but may ship to Canada.
If yes for equivalency arrangements and the operation is shipping out , did the inspector verify specific program requirements, including: <ul style="list-style-type: none"> • Critical variances • Labeling requirements of the destination country • Documentation requirements, including compliance of incoming ingredients, as applicable 	NA
If yes for equivalency arrangements and the operation has received EU or Canada product in , did the inspector verify incoming product was accompanied by: <ul style="list-style-type: none"> • NOP Import Certificate (EU) • Attestation statement (Canada)? 	NA
If yes for Japan export arrangement , did the inspector verify program requirements, including material use?	NA
Was the inspector aware of international agreement requirements?	Yes.
How is the inspector informed of the international agreements? What information or training is provided by the certifier?	Training with certifier. NOP website.



Does the OSP indicate participation in international agreements (i.e., would the inspector know of international agreement participation before arriving onsite)?	Yes
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Witness Audit – Auditor findings and citations

Finding 1
NP6279LCA.F1 -- 7 C.F.R. §205.501(a)(21) states, “Comply with, implement, and carry out any other terms and conditions determined by the Administrator to be necessary.” NOP 2603, Organic Certificates, Section 3.1, indicates the elements of an organic certificate.

Comments: *The following organic certificate elements are incorrect or missing on the certificates issued to operations:*

1. *The certificate does not list an anniversary date.*
2. *There are two labeling categories (100% Organic, Organic, Made With Organic....) stated on the certificate when only one category should be listed.*
3. *The certificate states “Certification renewal must be done annually before the anniversary date;” however, there is no anniversary date on the certificate and “certification renewal” is not defined in the USDA organic regulations nor the NOP Handbook.*
4. *The certificate states, “NOP regulation Final Rule 7 CFR Part 205,” rather than “Certified to the USDA organic regulations, 7 CFR Part 205.”*

Auditor Note: Statements made on the certificate:
Next renewal date: December 31, 2016. No Anniversary date.
Last Inspection date: December 24, 2015
Under Scopes it states “100%” organic, but in status box, it lists products as “org.”
“Certification renewal must be done annually before the anniversary date.”



Finding 2

Witness Audit – Auditor follow up requests or activities

Audit Chronology Log

Audit Identifier (if any): NP6279CA

Audit Type: Witness Audits

Accredited Certifying Agent Name: Ecological Farming Control Organization (ETKO)

Accreditation Manager (who is working on the project): Rebecca Claypool

Date	Activity
11/1/16	NC Report assigned to RC.
11/15/16	<p>RC reviewed the two Witness Audit check lists conducted for two handling/trader operations in the Kiev region of Ukraine. The noncompliance report, and notice of noncompliance are for the combined review of both witness audits.</p> <p>There was one finding between the two witness audits regarding incorrect and missing information on the certificates. RC changed some of the language in the narrative to preserve the confidentiality of the operations audited. The NC Report and NoNC were then drafted and submitted to RM via an email DocRouter for review.</p>
11/16/16	RC printed the hard copy folder for final approval.

AIA Document Router

Certifier: ETKO

Document(s): Noncompliance Report, Notice of Noncompliance

Author: Rebecca Claypool

Date: 11/16/16

File Path(s) and Document Name(s):

P:/AIA/ACA-Active/ETKO-Turkey/2016 WA Ukraine/NC/NP6279LCA NC Report ETKO 111516

P:/AIA/ACA-Active/ETKO-Turkey/2016 WA Ukraine/NC/NP6279LCA NoNC ETKO 111516

Assignment has been entered in the AIA workload tracking log: Yes No

AIA Assistant Director: **Renee Mann**

Further Editing Required

Initials

Date

Approved

Initials

Date

Remarks:

AIA Director: **Cheri Courtney**

Further Editing Required

Initials

Date

Approved

Initials

Date

Remarks:

STOP: Should this go to Accreditation Committee (AC) or Appeals? Pre-decisional and renewal audits, scope reduction or expansion, proposed suspension or proposed revocation (of certifier) go to AC.

This action needs to go to the AC before Deputy Administrator: Yes _____ No
Date went to AC

This action may be appealed and must go to Jenny Tucker: Yes _____ No
Jenny's initials

Deputy Administrator: **Miles V. McEvoy**

Further Editing Required

Initials

Date

Approved

Initials

Date

Remarks:

Return to: **Director Cheri Courtney**



August 26, 2016

Mustafa Akyuz
Ecological Farming Controlling Organization (ETKO)
160 Sk. No. 13/3
35100 Bornova-Izmir
Turkey

Dear Dr. Mustafa Akyuz:

The Quality Assessment Division (QAD) has received notification from the National Organic Program (NOP) to conduct a witness audit of the Ecological Farming Controlling Organization (ETKO) organic certification program in accordance with the USDA organic regulations (7 CFR Part 205).

If ETKO agrees to this assessment, the attached document, *GVD 1415A Form, Estimate of Audit Service*, needs your immediate attention. Costs incurred to conduct the assessment are the responsibility of ETKO. The attached estimate outlines the projected cost for the assessment.

The QAD must receive full payment for the amount indicated in the estimate prior to the assessment. Payment may be made by cashier's check, money order, credit card, or electronic fund transfer. Specific information about the payment options is included as an attachment to this letter. **Please be sure to include your FMMI Customer Number 3061711 with your payment.**

To assist the QAD in scheduling the assessment in a timely and cost effective manner, the completed and signed copy must be received by **Friday, September 9, 2016**:

1. Estimate of Audit Services, QAD 1415

If this document is not received by the indicated date, then the assessment cannot proceed, and the QAD will notify the NOP. Please submit the signed copies to the AIAInBox@ams.usda.gov , Lars.Crail@ams.usda.gov , and QAD.AuditService@ams.usda.gov).

We request the following items prior to arrival at the grower group location. Please submit the following items electronically by **Friday, September 9, 2016** to the Lars.Crail@ams.usda.gov .

1. The following certification file:
 - a. 3141D-01 – Ekolium, Kiev, Ukraine (Handler)
 - b. 3188D-01 – VIP Group LLC, Kiev, Ukraine (Handler)
 - c. 3214D-01 – Bel-Agro LLC, Kiev, Ukraine (Handler)

NOTE: For the purpose of the audit, the files should contain at a minimum the following items (limited to the most recent 1-2 years):



- a. Complete OSP (including labels, material/input lists, product(s) composition, etc...)
- b. Current Organic Certificate.
- c. Most recent inspection report(s)
- d. Notices issued during the last certification cycle (e.g. Minor Issues, Noncompliances, Proposed Adverse Actions, etc...)
- e. Review Checklist(s) and certification decision for the last certification cycle (e.g. initial review, certification decision documentation, label reviews, materials reviews, etc...)
- f. Initial application (if applicable)
- g. Internal Control System (ICS) quality manual(s) or document(s) (only for grower groups)
- h. Inspector's resume or CV (for Witness Audits only)
- i. Inspector's current contact information (for Witness Audits only)
- j. Inspector instructions.

Requested documents must be in English. If you have questions or concerns regarding this request, please contact me at Lars.Crail@ams.usda.gov .

Sincerely,

Lars Crail
Auditor
USDA, AMS, LPS, QAD Attached

Enclosure: QAD 1415A Form "Estimate of Audit Services"

CC: AIAInbox
Quality Assessment Division (QAD)
Rebecca Claypool, NOP AIA Accreditation Manager



Payment Options

Clients have four payment options: (1) check; (2) money order; (3) credit card; and (4) electronic funds transfer. Information about each option is outlined below.

Check or Money Order: Checks and money orders must be made payable to "USDA, AMS, LPS, QAD." Your FMMI Customer Number **must** be placed on the memo section of the check or money order.

Checks and money orders are mailed to a lock box at the U.S. Bank. Checks and money orders may be sent by overnight mail or regular mail, using the appropriate mailing address below. Please note that checks and money orders sent by regular mail may not be received in a timely manner. Questions may be directed to US Bank Customer Service at (314) 418-6635.

Overnight Mailing Address:

U.S. Bank
Attn: Government Lock Box 790304
1005 Convention Plaza
St. Louis, MO 63101

Regular Mail Address:

USDA, AMS, LPS, QAD
PO Box 790304
St. Louis, MO 63179-0304

Please note: Effective October 1, 2012 the lockbox bank (U.S. Bank in St. Louis) no longer processes checks drawn from foreign banks with no identifiable U.S. affiliated bank or those with the words "Payable in U. S. Dollars" or "U.S. Dollars" imprinted on them. When the lockbox bank receives these checks, they are sent to the Billings and Collections Team (BCT) in Minneapolis, MN. BCT bundles these checks together and sends them to CITI Bank for processing. CITI Bank will not confirm the deposit of any such check until all of the checks in the bundle have fully cleared. This process may take anywhere from 3 to 21 business days.

Payments that are not cleared in a timely manner may result in the issuance of dunning notices, demand letters, and/or the assessment of interest fees. Clients that make payments by checks drawn from foreign banks are encouraged to make future payments using other options such as issuing checks from U.S. banks (or foreign banks with U.S. affiliates), paying via credit card, or using the Pay.Gov system.

Credit Card:

Credit card, debit card and bank account payments are now being accepted through PAY.GOV. If you need assistance please contact the National Billing Office, (501)312-2962 or QAD.BusinessOps@ams.usda.gov

Be advised of the following Pay.Gov payment limits:

Credit Cards



- Up to a total of \$24,999.99 for all transactions with one or more U.S. Government agencies conducted on the same day using the same credit card.

Debit Cards

- No limit except for the funds available in your account.

Bank Accounts

- Up to \$99,999.999.99 per transaction, limited by the funds available in the account.

To submit payment, follow these steps:

Step 1: Go to www.pay.gov

Step 2: Click on “Make a Payment”

Step 3: Enter “AMS” in the search box under #2 at the bottom of the screen

Step 4: Select “continue to the form” under USDA AMS Account Statements

Step 5: On Accepted Payment Methods screen, click on “continue to the Form”.

Step 6: Fill out the AMS form

Step 7: Select payment method

Step 8: Enter payment information.

Step 9: Review and submit payment

Step 10: Check box to receive email confirmation

Step 11: Enter all email addresses to receive payment confirmation

Step 12: Check the payment authorization box.

Step 13: Click “Submit”

Please enter this address for payment confirmation to AMS, LPS, QAD:
QAD.BusinessOps@ams.usda.gov

Electronic Fund Transfers (EFT):

The USDA has implemented procedures for Electronic Fund Transfers (EFT) through the Federal Reserve Bank. Any fees associated with the transfer are the responsibility of the remitter; please check with your financial institution to make sure there are no surprises.

The following information should be included with your payment. We also request that you send an email of this information to make sure we are able to identify the payment. The information can be sent to ABShelpline@aphis.usda.gov:



1. Organization Name / Company Name
2. **FMMI Customer number**
3. Purpose of payment
4. Contact name and number

Automated Clearing House (ACH) transactions are processed through Remittance Express by the Federal Reserve Bank of Richmond. The process accepts information in the Cash Concentration and Disbursement (CCD) or the Corporate Trade Exchange (CTX) formats. You will need the following information to remit a payment:

ABA: 051036706
Name on Account: USDA, Marketing and Regulatory Programs (MRP),
Agricultural Marketing Service (AMS)
Account Number: 540020

Wire transfers are processed through the Federal Reserve Bank of New York. You will need the following information to remit a payment.

ABA: 021030004
Name on Account: USDA, Agricultural Marketing Service (AMS)
Account Number: 12250001

International wire transfers, remitters should send through a US bank or a correspondent bank before going to the Federal Reserve.



1400 Independence Avenue, SW.
Room 2648-S, STOP 0268
Washington, DC 20250-0268

NOTICE OF NONCOMPLIANCE RESOLUTION

Mustafa Akyuz
Ecological Farming Control Organization
160 Sk. No. 13/7
Bornova – Izmir, 35100
Turkey

Dear Dr. Akyuz:

On October 6, 2016, a representative of the United States Department of Agriculture (USDA), Agricultural Marketing Service (AMS), National Organic Program (NOP), completed an onsite witness audit of the Ecological Farming Control Organization (ETKO) organic certification program. The objective of the audit was to determine ETKO's compliance to the USDA organic regulations as an accredited certifying agent. A copy of the auditor's report, NP6279LCA, is enclosed for your reference. As the report indicates, one noncompliance (NP6279LCA.NC1) was identified during the onsite audit.

ETKO submitted corrective actions to the NOP on December 9, 2016. The proposed corrective actions demonstrated how the existing noncompliance was remedied and also indicated how ETKO's quality management system will be modified to prevent future noncompliances. The corrective actions adequately address the noncompliance, as described in the attached Corrective Action Report. The corrective actions will be verified during your next site evaluation assessment.

If you have questions regarding this notice, please contact Graham Davis, Accreditation Manager, at (202) 692-0047 or Graham.Davis@ams.usda.gov.

Sincerely,

Cheri Courtney
Director, Accreditation and International Activities Division
National Organic Program

Enclosure: Corrective Action Report NP6279LCA

cc: AIA Inbox



1400 Independence Avenue, SW.
Room 2648-S, STOP 0268
Washington, DC 20250-0268

NOTICE OF NONCOMPLIANCE RESOLUTION

JAN 09 2017

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Sincerely,

A handwritten signature in blue ink, appearing to read "Cheri Courtney".

Cheri Courtney
Director, Accreditation and International Activities Division
National Organic Program

Enclosure: Corrective Action Report NP6279LCA

cc: AIA Inbox

NATIONAL ORGANIC PROGRAM: NONCOMPLIANCE REPORT

AUDIT AND REVIEW PROCESS

The National Organic Program (NOP) conducted witness audits of Ecological Farming Control Organization's (ETKO) certified operations. Onsite witness audits were conducted, and the audit reports reviewed to determine ETKO's capability to continue operating as a USDA accredited certifier.

GENERAL INFORMATION

Applicant Name	Ecological Farming Control Organization (ETKO)
Physical Address	160 Sokak 13/3, Bornova – Izmir, 35100, Turkey
Mailing Address	160 Sokak 13/3, Bornova – Izmir, 35100, Turkey
Contact & Title	Dr. Mustafa Akyuz
E-mail Address	ma@etko.com.tr
Phone Number	90 542 640 5944
Reviewer & Auditor	Rebecca Claypool, NOP Reviewer; Lars Crail, On-site Auditor(s).
Program	USDA National Organic Program (NOP)
Review & Audit Dates	NOP assessment review: November 15, 2016 Onsite audit: October 6-7, 2016
Audit Identifier	NP6279LCA
Action Required	Yes
Audit & Review Type	Witness Audits
Audit Objective	To evaluate the conformance to the audit criteria; and to verify the implementation and effectiveness of ETKO's certification
Audit & Determination Criteria	<i>7 CFR Part 205, National Organic Program as amended</i>
Audit & Review Scope	ETKO's certification services in carrying out the audit criteria.

ORGANIZATIONAL STRUCTURE:

The Ecological Farming Controlling Organization is abbreviated as ETKO from their Turkish name (Ekolojik Tarım Kontrol Organizasyonu). ETKO is a for-profit, limited liability company with two shareholders. The main office for USDA organic certification is located in Bornova – Izmir, Turkey. All certification activities for the NOP are conducted at the Izmir office; there are no satellite offices that conduct USDA organic key activities. ETKO was initially accredited as a certifying agent on January 22, 2003 for crops, wild crops, and handling. ETKO currently certifies operations to the USDA organic regulations in the following countries: Turkey, Russia, Serbia, Korea, Kazakhstan, and the Ukraine.

SUMMARY OF WITNESS AND REVIEW AUDITS CONDUCTED:

The NOP auditor conducted a one-day witness audit of an annual announced inspection of an ETKO handler/trader/exporter located in Kiev, Ukraine. The operation trades organic products and does not physically handle the products. The products traded (or intended for trade) are: corn, flax, mustard, peas, rapeseeds, soybean, sunflower (seeds), sunflower (oil), and sunflower (cake/expeller). The oil products are processed at a separate certified facility. The trading operation was first certified in December 1, 2014. The inspection was conducted in English with the company's consultant present. There was one sale and shipment of sunflower oil during 2016.

The NOP auditor conducted a half-day witness audit of an annual announced inspection of an ETKO handler/trader/exporter with an office in Kiev, Ukraine. Again this trader does not physically handle organic products. There are 18 grain products traded (or intended to be traded) as raw, processed, and as livestock feed. This trading operation was first certified on November 7, 2014. The inspection was conducted in English with the operation's owner.

NOP DETERMINATION

Noncompliances Identified during the Current Assessment

NP6279LCA.NC1 – 7 C.F.R. §205.501(a)(21) states, “Comply with, implement, and carry out any other terms and conditions determined by the Administrator to be necessary.” NOP 2603, Organic Certificates, Section 3.1, indicates the elements of an organic certificate.

Comments: *The following organic certificate elements are incorrect or missing on the certificates issued to operations:*

- 1. The certificate does not list an anniversary date.*
- 2. There are two labeling categories (100% Organic, Organic, Made With Organic....) stated on the certificate when only one category should be listed.*
- 3. The certificate states “Certification renewal must be done annually before the anniversary date;” however, there is no anniversary date on the certificate and “certification renewal” is not defined in the USDA organic regulations nor the NOP Handbook.*
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E-mail Address	ma@etko.com.tr
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NOTICE OF NONCOMPLIANCE

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Please refer to [NOP 2608 Responding to Noncompliances](#) for further instructions on how to respond to noncompliances. Failure to promptly resolve the noncompliance may result in proposed suspension or revocation of ETKO's USDA accreditation.

If you have questions regarding this notice, please contact, Rebecca Claypool, Accreditation Manager, at Rebecca.E.Claypool@ams.usda.gov or (202) 350-5706.

Sincerely,

Cheri Courtney
Director, Accreditation and International Activities Division
National Organic Program

Enclosure: Noncompliance Report

cc: AIA Inbox



1400 Independence Avenue, SW.
Room 2648-S, STOP 0268
Washington, DC 20250-0268

NOV 23 2016

NOTICE OF NONCOMPLIANCE

Mustafa Akyuz
Ecological Farming Control Organization
160 Sk. No. 13/7
Bornova – Izmir, 35100
Turkey

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Sincerely,

A handwritten signature in blue ink that reads "Cheri Courtney".

Cheri Courtney
Director, Accreditation and International Activities Division
National Organic Program

Enclosure: Noncompliance Report

cc: AIA Inbox

Schurkamp, Lynnea - AMS

From: ma@etko.com.tr
Sent: Friday, December 30, 2016 4:06 PM
To: Davis, Graham - AMS
Cc: 'Ceren BAYAZIT'; 'FATIH BEY'
Subject: RE: Corrective actions
Attachments: GP 18 F 21 NOP Certificate.Rev01.20161230.pdf

Dear Graham

Thank you for information, we updated the Certificate accordingly.

By this chance ETKO team wishes you a Happy New Year.

Best regards

Mustafa

ETKO Turkey

T+90-232-3397606

F+90-232-3397607

www.etko.com.tr

From: Davis, Graham - AMS [mailto:Graham.Davis@ams.usda.gov]
Sent: Friday, December 30, 2016 7:50 PM
To: ma@etko.com.tr
Cc: Mann, Renee - AMS; Courtney, Cheri - AMS
Subject: Corrective actions

Dear Dr. Akyuz,

Thank you for submitting the corrective actions for the witness audit that occurred on October 6, 2016. ETKO is correct that the certificate should be renewed annually. The statement, "The certificate should be updated at least annually", however, should be removed from ETKO's certificate template. A situation may occur where a client's renewal is delayed past the 12 months so this statement may cause unnecessary confusion. Please remove the statement from your certificate template and provide the NOP with an updated version.

Thank you.

Graham

Graham Davis
Accreditation Manager
USDA | NATIONAL ORGANIC PROGRAM
1400 Independence Ave SW | 2649-S | Washington DC 20250
Desk: 202-692-0047 | Cell: (b) (6)



[Join the NOP mailing list](#)

This electronic message contains information generated by the USDA solely for the intended recipients. Any unauthorized interception of this message or the use or disclosure of the information it contains may violate the law and subject the violator to civil or criminal penalties. If you believe you have received this message in error, please notify the sender and delete the email immediately.